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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Implement the Commission's Procurement Incentive Framework and to Examine the Integration of Greenhouse Gas Emissions Standards into Procurement Policies.	R. 06-04-009

REPLY COMMENTS OF THE ALLIANCE FOR RETAIL ENERGY MARKETS ON THE PROPOSED DECISION OF PRESIDENT PEEVEY AND ALJ GOTTSTEIN

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In accordance with Article 14 of the Commission's Rules of Practice and Procedure, the Alliance for Retail Energy Markets ("AReM") respectfully submits these reply comments on the Proposed Decision of President Michael R. Peevey and Administrative Law Judge ("ALJ") Meg Gottstein issued on December 13, 2006 (the "Proposed Decision" or "PD").[1]

I. Introduction

As recommended by AReM and other parities, the Proposed Decision adopts an "after-the-fact" compliance process for electric service providers ("ESPs"), community choice aggregators ("CCAs"), and small electrical corporations and the opening comments on the PD indicate that there is support or acceptance of this approach among a broad range of parties. There were two instances, however, where parties argued the PD should be modified to require such entities to submit their long-term procurement commitments to the Commission for review and pre-approval the same as the major investor owned utilities ("IOUs"). Those instances appear in the opening comments filed jointly by the Natural Resources Defense Council ("NRDC"), The Utility Reform Network ("TURN"), and the Union of Concerned Scientists ("UCS"), and in the opening comments filed by Pacific Gas and Electric Company ("PG&E"). As these parties merely rehash arguments that were made in the underlying proceeding and

[1] AReM is a California mutual benefit corporation whose members are electric service providers that are active in California's direct access market. The positions taken in this filing represent the views of AReM but not necessarily those of its members or affiliates of its members with respect to the issues addressed herein.

which the PD rejects or simply ignores, their comments should be "accorded no weight" as provided in Rule 14.39(c). So as to ensure there is no "backsliding" on this topic in the Commission's final decision, however, AReM will briefly respond to their arguments below.

II. Reply Comments

A. The PD correctly concludes that adopting an after-the-fact compliance process for ESPs is both within the Commission's discretion and fully consistent with SB 1368.

NRDC/TURN/UCS argue that adopting an upfront approval process for ESPs, CCAs, and small electrical corporation is required "in order to be as fully consistent with the intent and primary goals of SB 1368 as possible."[2] As the PD reflects, these parties made essentially the same argument in the underlying proceeding.[3] After reviewing the relevant provisions of SB 1368, the PD concludes that the statute provides the Commission "the flexibility to consider a range of procedural vehicles for use by those LSEs for whom we do not currently have a procurement pre-approval process in place."[4] In other words, adopting an after-the-fact compliance process for ESPs, CCAs and small electrical corporations is fully consistent with SB 1368. While NRDC/TURN/UCS may believe an upfront approval process for all LSEs is preferable, they have not demonstrated that adopting an after-the-fact compliance process for ESPs would be inconsistent in any way with the intent or goals of SB 1368.

B. The PD correctly finds that adopting an after-the-fact compliance process for ESPs will avoid unnecessary administrative complexity.

NRDC/TURN/UCS also recycle the arguments that requiring upfront approval of LSE commitments "is the most administratively simple and efficient means of enforcing the EPS" and that monetary penalties will not serve as an adequate disincentive for non-compliance by LSEs that are allowed to make after-the-fact attestations of compliance with the EPS. [5] As the PD correctly concludes, however, an after-the-fact compliance process for ESPs, CCAs and small electrical corporations, which unlike the IOUs, are not currently required to submit procurement plans or procurement contracts for pre-approval for other purposes, "avoids creating new pre-approval requirements and associated administrative complexity for the Commission's regulation

[2] NRDC/TURN/UCS Opening Comments on PD, p. 4.
[3] PD, p. 129.
[4] *Id.*, p. 131.
[5] NRDC/TURN/UCS Opening Comments on PD, p. 4.

of the procurement practices of these entities."[6] Moreover, the PD adopts documentation and other requirements that "provide reasonable safeguards against the risks to ratepayers of potential non-compliance by an LSE that files an after-the-fact compliance showing."[7] NRDC/TURN/UCS's concern that monetary penalties alone will not adequately protect ratepayers in terms of ensuring compliance is unwarranted.

C. As the PD recognizes, ESPs are likely to be very conservative in interpreting the EPS rules.

NRDC/TURN/UCS also suggest in their comment that upfront approval is necessary to "ensure consistent application of the EPS across all [LSEs]."[8] There is simply no reason to believe, however, that allowing ESPs to make after-the-fact attestations of compliance will result in uneven application of the EPS. NRDC/TURN/UCS apparently believe that ESPs will be prone to "interpret the EPS for certain circumstances in a different manner." If anything, however, such entities are likely to be overly conservative when it comes to interpretation of the EPS rules. That would be consistent with the typical ESP business model, which focuses on minimizing the ESP's business and regulatory risks. Indeed, the PD implicitly recognizes this conservatism among such entities when it advises that they should not burden the Commission "with requests for pre-approval of financial commitments that are clearly exempt from having to show EPS compliance, such as a single contract for a term of less than five years."[9]

D. Adopting an after-the-fact compliance process for ESPs does not unfairly discriminate against the IOUs.

PG&E argues that the after-the-fact compliance process for ESPs, CCAs and small electrical corporations adopted in the Proposed Decision would "discriminate based on the status of the entity subject to the EPS."[10] Though not stated in PG&E's comments, the implication is that PG&E and the other IOUs will somehow be placed at a competitive disadvantage if ESPs are not required to subject to an upfront approval requirement the same at the IOUs. That suggestion, however, should be viewed with a great deal of skepticism given the obvious advantages enjoyed by the IOUs in competing for EPS-compliant resources. Moreover, as the Commission has previously recognized, it is entirely appropriate to take the differences between

[6] PD, p. 132.
[7] *Id.*, pp. 131-132.
[8] NRDC/TURN/UCS Opening Comments on PD, p. 5.
[9] PD, p. 134.
[10] PG&E Opening Comments, p. 8.

ESPs and IOUs into account in the rulemaking context. For example, in the Commission's decision establishing the basic parameters for the participation of ESPs and CCAs in the Renewables Portfolio Standard ("RPS") program, the Commission observed:

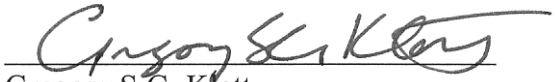
> This Commission has less overall control over how ESPs and CCAs operate than we do over how utilities operate. Also, to the extent we consider ESP and CCA operations, our concerns about their operations differ somewhat from our concerns about the operations of the investor-owned utilities. In the context of the RPS program, our primary concern is to ensure that ESPs and CCAs do in fact reach the goal of 20% renewable energy by 2010. We are, however, somewhat less concerned about the details of how they get there.
>
> Therefore, we do not believe it is reasonable to require these entities to be subject to the exact same steps for RPS implementation purposes as the utilities we fully regulate. … Unlike an IOU, an ESP faces more financial challenges to the recovery of costs from its customers. Thus, we are sensitive to the particular requirements and pressures of each type of entity and do not necessarily want to impose a "one size fits all" RPS regulatory scheme.[11]

As AReM has explained in previous comments in this proceeding, similar considerations make it appropriate to adopt an after-the-fact compliance process for ESPs.

III. Conclusion

For the foregoing reasons, the Commission should reject the recommendations of NRDC/TURN/UCS and PG&E to modify the Proposed Decision to require upfront approval of the long-term procurement commitments of ESPs, CCAs and small electrical corporations.

Respectfully submitted,



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Date: January 8, 2007

[11] D.05-11-025, pp. 12-13 (as modified by D.06-03-016).

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing document on all parties of record in the above captioned proceedings by serving an electronic copy on their email addresses of record and, for those parties without an email address of record, by mailing a properly addressed copy by first-class mail with postage prepaid to each party on the Commission's official service list for this proceeding.

This Certificate of Service is executed on January 8, 2007, at Woodland Hills, California.

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